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Joseph Perez

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JOSEPH PEREZ, an individual ,

Plaintiff

vs.

CHARLES DANIELS, et al.,

Defendants

Case No. 2:21-cv-02061-CDS-VCF

**STIPULATION AND ORDER TO EXTEND TIME  
TO FILE RESPONSE TO MOTION TO DISMISS**

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MOTION TO DISMISS**

Pursuant to Local Rule 7-1, Plaintiff Joseph Perez (“Perez”) and Defendants Terrence Agustin, Arianna Arynhard, Gregory Bryan, Arturo Buen, Charles Daniel, Glenn Fowler, Justin Gordon, Benedicto Gutierrez, Calvin Johnson, Teodoro Manalang, Michael Minev, Jennifer Nash, and Brian Williams (collectively, “NDOC Defendants”), by and through their counsel of record, do hereby stipulate and agree as follows:

1. On April 7, 2022, Perez filed his First Amended Complaint, again doing so pro se.  
[ECF No. 6.]

2. On July 14, 2023, NDOC Defendants filed the Motion to Dismiss (the “Motion”).  
[ECF No. 37.]

3. Perez presently has until July 27, 2023, to file a Response to the Motion.

4. In light of the schedule of defense counsel over the next three weeks (which includes a number of deadlines and hearings) and the need to communicate effectively with Perez concerning the briefing (which is complicated by the fact that he is in prison), the parties hereby stipulate and agree that Perez's Response to the Motion shall be extended from July 27, 2023, to August 11, 2023.

5. This is the first stipulation for an extension of time to file the Response to the Motion. This stipulation is made in good faith and not to delay the proceedings.

DATED this 27th day of July, 2023.

DATED this 27th day of July, 2023.

BAILEY ♦ KENNEDY

OFFICE OF THE ATTORNEY GENERAL

By: /s/ Tayler D. Bingham

By: /s/ Chris W. Davis

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*Attorneys for NDOC Defendants*

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Joseph Perez*

IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

Dated: July 28, 2023